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7           *Counsel for Mark D. Waldron, Chapter 7 Trustee*

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10           **UNITED STATES BANKRUPTCY COURT**  
11           **EASTERN DISTRICT OF WASHINGTON**

12           In re:

13           GIGA WATT, Inc., a  
14           Washington corporation,  
15           Debtor.

16           Case No. 18-03197 FPC 7

17           The Honorable Frederick P. Corbit  
18           Chapter 7

19

20           **DECLARATION OF PAMELA M. EGAN**  
21           **IN SUPPORT OF CHAPTER 7**  
22           **TRUSTEE'S MOTION FOR SANCTIONS**  
23           **AGAINST JOHN T. WINSLOW**

24

25           I, Pamela M. Egan pursuant to 28 U.S.C. § 1746 hereby declare as follows:

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27           1. I am over 18 years of age, of sound mind, and otherwise competent to  
28 make this Declaration.

29

30           2. I am a partner with the law firm of Potomac Law Group PLLC  
31           ("PLG"), which represents Mark D. Waldron, the Chapter 7 Trustee, as general  
32           counsel in the above-captioned case. I submit this declaration in support of the  
33           *Chapter 7 Trustee's Motion for Sanctions Against John T. Waldron* (the  
34           "Motion"), filed herewith.

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1       3. The statements made herein are based on my personal knowledge. If  
2 called to testify I would and could testify competently to the statements made  
3 herein.

4       4. A true and correct copy of the Motion for Stay Pending Appeal of  
5 Order (i) Approving the Sale of Moses Lake Equipment and Related Relief, (ii)  
6 Approving Bid Procedures, U.S. District Court, ED WA (“District Court”), *Dam v.*  
7 *Waldron*, Case No. 2:20-cv-00391-SAB, filed on November 2, 2020, D.Ct. ECF  
8 No. 4 is attached to the Motion as Exhibit A.

9       5. A true and correct copy of the Memorandum in Support of Motion for  
10 Stay Pending Appeal of Order (i) Approving the Sale of Moses Lake Equipment  
11 and Related Relief, (ii) Approving Bid Procedures, District Court (without the  
12 approx. 300 pages of exhibits), *Dam v. Waldron*, Case No. 2:20-cv-00391-SAB,  
13 filed on November 30, 2020, Dt. Ct. ECF No. 14 is attached to the Motion as  
14 Exhibit B.

15       6. A true and correct copy of the Appellant’s Opening Brief, District  
16 Court, *Dam v. Waldron*, Case No. 2:20-cv-00391-SAB (relating to the ML  
17 Equipment Sale), filed on January 19, 2021, D.Ct. ECF No. 17 is attached to the  
18 Motion as Exhibit C.

19       7. A true and correct copy of the Order Denying Motions as Moot,  
20 District Court, *Dam v. Waldron*, Case No. 2:20-cv-00391-SAB (relating to the  
21 motion to stay the ML Equipment sale), filed on January 21, 2021), D.Ct. ECF  
22 No. 18 is attached to the Motion as Exhibit D.

23 EGAN DECL. IN SUPPORT OF CH. 7  
24 TRUSTEE’S MOTION FOR SANCTIONS  
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1       8. A true and correct copy of the Order Affirming the Bankruptcy  
2 Court's Sale Approval Order, *Dam v. Waldron*, Case No. 2:20-cv-00391-SAB  
3 (ML Equipment Sale appeal), filed on July 30, 2021, D.Ct. ECF No. 21 is attached  
4 to the Motion as Exhibit E.

5       9. A true and correct copy of the Stipulation of Settlement, District  
6 Court (without attached exhibits), *Blomquist and Dam v. Perkins et al.*, D.Ct. Case  
7 No. 2:20-cv-464-SAB, filed on November 29, 2023, D.Ct. ECF No. 61-4 is  
8 attached to the Motion as Exhibit F.

9       10. A true and correct copy of the Order Granting Final Approval of Class  
10 Action Settlement, District Court, *Blomquist and Dam v. Perkins et al.*, D.Ct. Case  
11 No. 2:20-cv-464-SAB, filed on May 23, 2024, D.Ct. ECF No. 83 is attached the  
12 Motion as Exhibit G.

13       11. A true and correct copy of the Stipulated Dismissal of Consolidated  
14 Appeals, District Court, *Dam v. Waldron*, Case No. 2:21-cv-00291-SAB, filed on  
15 June 28, 2024, D.Ct. ECF No. 65, together with the Order Granting Dismissal and  
16 Closing File, District Court, *Dam v. Waldron*, D.Ct. Case No. 2:21-cv-00291-SAB,  
17 filed on August 2, 2024, D.Ct. ECF No. 66 is attached to the Motion as Exhibit H.

18       12. PLG has accrued \$40,936.50 in unpaid fees relating to Mr. Winslow's  
19 vexatious litigation in the Chapter 11 case.

20       13. Of the Chapter 7 fees paid to PLG, \$24,720 is attributable to Mr.  
21 Winslow's vexatious litigation.

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23 EGAN DECL. IN SUPPORT OF CH. 7  
24 TRUSTEE'S MOTION FOR SANCTIONS  
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14. PLG has incurred an additional \$46,040.00 in unpaid fees relating to the tandem objections of Messrs. Winslow and Dam to PLG's fees (ECF Nos. 1048 and 1051), the *Chapter 7 Trustee's Motion for a Pre-Filing Review Order and/or Sanctions Against Jun Dam* (ECF No. 1056) and this Motion. These fees are accruing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of September 2024 in Seattle, Washington.

Pamela M. Egan

Pamela M. Egan

EGAN DECL. IN SUPPORT OF CH. 7  
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